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Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter of )  
 )  
Petition for a Microstation ) RM No. 9208  
Radio Broadcasting Service )  
 )

To: The Commission

**Additional Reply Comments Concerning a  
One-Watt Microbroadcasting Option**

The following comments are submitted to further explain the usefulness of a watt-one microbroadcasting option and to rebut the comments of the National Association of Broadcasters (NAB) and Rodger Skinner who rejected the concept of very low power microbroadcasting. Our comments are filed in support of the idea that a one-watt option should be included in the range of options made available to microbroadcasting. These comments are not intended as opposition to the concept of higher power microradio broadcasting options presented in our own two-tier comments as well as by other comments.

The concept of one-watt microbroadcasting stations is designed for neighborhood broadcasting. This is broadcasting originating from a neighborhood, intended for that neighborhood. This is a local service that would uniquely serve local needs. This service is not intended for mobile listeners. However, it would be useful to have these stations at the same point on the dial so visitors can easily find them.

Each one-watt station would have a coverage area of approximately 1.2 miles diameter. This coverage area is suitable for either a larger single neighborhood or several smaller neighborhoods.

These one-watt stations could transmit the following types of neighborhood and community information and programs:

1. Neighborhood watch, police, and fire announcements specifically directed at safety

within that neighborhood.

2. Neighborhood microradio stations could be equipped to transmit Emergency Alert System (EAS) messages that are directed to that specific locality by the Specific Area Message Encoding (SAME) protocol. This protocol allows alert messages to be directed to affected counties.

3. Community Notifications such as meeting notices for Parent Teacher Associations (PTA), community service meetings, local religious services (church, synagogue, and mosque), home owners and condominium associations, job fairs, school lunch menus, etc.

4. Advertisements for neighborhood church suppers, car washes, and charity drives as well as advertisements for neighborhood businesses such as seamstresses, cleaners, news stands, community child care, pizza stands, food stores, and local specialty stores.

5. Music provided by neighborhood musicians and groups including high school groups on the air for the first time.

6. Political comments and discussion on local issues such as school board elections, school curriculum and after school activity, garbage removal, parking, zoning issues, etc.

7. Neighborhood developed educational material where citizens originate and share information rather than passively listening to information from centralized sources.

These neighborhood services cannot be provided by the conventional commercial broadcasters or by National Public Radio (NPR). They cannot even be provided by the higher power "microbroadcasting" stations proposed by Mr. Skinner in RM 9242.

These services can be effectively presented by the one-watt stations despite the assertions of the NAB. Consider the nation to be covered as a surface like a floor. You can pave this area more efficiently with pennies (the one-watt station coverage areas) than you can with Frisbees (larger broadcast stations). While this low power coverage is effective, it is also unique. NAB and NPR cannot deliver it.

The one-watt microradio broadcasting stations are not expected to be self supporting commercial enterprises in the manner that higher power microradio stations could be. These

one-watt stations would be paid for by their neighborhoods with perhaps some support from other sources such as local governments or from NPR.

One-watt stations have the advantage that they can easily stay on the air during prolonged power failures such as those that occurred during the New England ice storms last winter. A simple lantern battery can power a one-watt station for a long time. A car battery will power such a station through even the longest power failure. The one-watt station along with its listeners' portable radios would be a very useful coordinating tool when the neighborhood's power and phones are out of service.

For these reasons, we propose that the one-watt station be included as a full member of the set of options provided for microradio broadcasting. The one-watt station should be a permanent station. These stations should not be able to be bumped off their frequencies by higher power stations the way they can in the rules proposed in Mr. Skinner's RM 9242.

The Commission should seriously consider the one-watt station as one of the options that should be set up for a new microradio broadcasting service.

Respectfully submitted,

*Nickolaus E. Leggett*

*Judith Fielder Leggett*

Nickolaus E. Leggett  
Judith F. Leggett  
1432 Northgate Square, Apt. 2A  
Reston, VA 20190-3748  
(703) 709-0752

*Donald J. Schellhardt (JFL)*

Donald J. Schellhardt, Esq.  
45 Bracewood Road  
Waterbury, CT 06706  
(203) 591-9177

Attorney Donald J. Schellhardt was unavailable at the time these reply comments were finalized. Judith Fielder Leggett was given express permission to sign these reply comments on his behalf.

Copies of these additional comments are being sent to all parties who serviced us with their comments.

Dated: June 22, 1998  
June 22, 1998